



Invensys Pension Trustee Limited Data Protection Privacy Acknowledgements and Consents – for provision to Invensys Pension Scheme Members

Special Categories of Personal Data and Consent

In order to effectively administer the policy and your benefits under the Scheme, please note that we are required to collect, process and disclose Special Categories of Personal Data about you which may include health data or data relating to your sexual orientation and your partner's gender, which you may provide or have provided to us, or we may have obtained or may obtain from other sources to the extent relevant to the administration of your policy and the benefits under the Scheme.

For example we may need to process data about your health in relation to your application for an ill-health benefit and we may record details of your personal relationships, for example on an 'Expression of Wishes' form so that we can distribute any benefits payable on your death .

You consent to us processing these types of personal data so that we can adequately provide a pensions administration service to you.

If at any time you do not want us to process this personal data, you can contact us at the address at paragraph 5.4 of the Data Protection Notice below

You should be aware that in most circumstances we will not be able to provide these services to you without continuing to process this personal data.



Invensys Pension Trustee Limited Data Protection Notice – for provision to Invensys Pension Scheme Members

1 Privacy Policy

- 1.1 Invensys Pension Trustee Limited in its capacity as Trustee of the Invensys Pension Scheme (**The Trustee/we/us/our**) is committed to safeguarding the privacy of our members and your agents and relations (**you**) to whom we provide services. We use commercially reasonable physical, electronic and procedural measures to protect your personal information in accordance with data protection legislative requirements. This Privacy Policy sets out our personal information collection and how we share the personal information you provide to us either in person, in writing, through our website, via email or over the phone.
- 1.2 Further notices highlighting certain uses we wish to make of your personal information, together with the ability to opt in or out of selected uses, may also be provided to you when we collect personal information from you.
- 1.3 This Privacy Policy is intended to explain our privacy practices and covers the following areas
- (a) What personal information about you we may collect
 - (b) How we may use your personal information
 - (c) Who we may disclose your personal information to
 - (d) How we protect your personal information
 - (e) Contacting us and your rights in relation to your personal information
 - (f) How changes to this Privacy Policy will be made

2 Information we may collect about you

- 2.1 We may collect and process the following personal information about you:
- (a) **Information you provide to us:** personal information that you provide to us, such as in relation to your actual or potential membership of our pension scheme(s) including your name, gender, age and date of birth, address (and/or proof of address), other contact details, your bank account details, details of your employment and details of your family;
 - (b) **Credit and Anti-Fraud information:** information relating to your financial situation, your creditworthiness or any criminal or fraudulent activities provided to us by you or third parties including information which establishes your identity, such as passports and utility bills; information about transactions, credit ratings from credit reference agencies; fraud, offences, suspicious transactions, politically exposed person and sanctions lists where your details are included;

- (c) **Our correspondence:** if you contact us, we may keep a record of that correspondence;
- (d) **Your receipt of services:** details of the services and scheme and fulfilment of the services and scheme we provide; and
- (e) **Website and communication usage:** where you visit our websites, we will also collect details of your visits to the websites and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access

3 Uses made of your personal information

3.1 We may use your personal information in the following ways. For each use, we note the legal bases we use to justify each use of your personal information. Further explanation of these legal bases can be found in Appendix 1 to this policy.

- (a) **To provide our services effectively to you, administer your benefits under the scheme and conduct our business:** to administer our services, including to carry out our obligations (including in relation to administering the benefits under your scheme), which may include passing your data to third parties such as agents or contractors or to our advisors (e.g. legal, financial, actuarial or other advisors);

Legal bases: legitimate interests (to enable us to perform our obligations and provide our services to you)

- (b) **In relation to fraud prevention:** we and other organisations may also access and use certain information to prevent fraud as may be required by applicable law and regulation and best practice at any given time. If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention and debt collection agencies and may be recorded by us or by them;

Legal bases: legal obligations, legitimate interests (to ensure that you fall within our acceptable risk profile and to assist with the prevention of crime and fraud),

- (c) **To recover debts due:** to recover any payments due to us and where necessary to enforce such recovery through the engagement of debt collection agencies or taking other legal action (including the commencement and carrying out of legal and court proceedings);

Legal bases: legal claims, legitimate interests (to ensure that we are paid for our services)

- (d) **To monitor certain activities:** to monitor calls and transactions to ensure service quality, compliance with procedures and to combat fraud;

Legal bases: legal obligations, legal claims, legitimate interests (to ensure the quality and legality of our services)

- (e) **To inform you of changes:** to notify you about changes in respect of administration of the pension scheme;

Legal bases: legitimate interests (to notify you about changes to our service).

- (f) **To ensure website content is relevant:** where you are using our website, to ensure that content from our websites is presented in the most effective manner for you and for your device, which may include passing your data to business partners, suppliers and/or service providers;

Legal bases: contract performance, legitimate interests (to allow us to provide you with the content and services on the websites)

- (g) **To transfer it to a replacement trustee:** in the event that we are removed as a trustee, we may need to transfer some or all of your personal information to the relevant replacement trustee or third party (or its advisors) as part of any due diligence process or transferred to that third party and used for the same purposes as set out in this policy;

Legal bases: legitimate interests (in order to allow us to transfer your data to replacement trustees)

- (h) **In connection with legal or regulatory obligation:** We may process your personal information to comply with our regulatory requirements or dialogue with our regulators as applicable which may include disclosing your personal information to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.

Legal bases: legal obligations, legal claims, legitimate interests (to cooperate with law enforcement and regulatory authorities)

- (i) **Actuarial valuations:** in order to carry out the management of the pension scheme, we are required to provide membership data to our actuarial advisers for valuation purposes. The data is used for bulk calculations and is provided under a statutory requirement.

Legal bases: legal obligations, legitimate interests (to comply with statutory requirements)

- (j) **Monitoring of Third Party Administrator (TPA):** we may use data provided by you to monitor the performance of our TPA, such as reviewing feedback from member questionnaires and looking into complaints.

Legal bases: legitimate interests (to ensure the service provided to members is of an acceptable standard).

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You consent to us processing these types of personal data so that we can adequately provide a pensions administration service to you.

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You should be aware that in most circumstances we will not be able to provide these services to you without continuing to process this personal data.

4 Transmission, storage and security of your personal information

Security over the internet

- 4.1 While no data transmission (including over the Internet or website) can be guaranteed to be secure from intrusion, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal information in accordance with data protection legislative requirements.
- 4.2 All information you provide to us is stored on our or our subcontractors' secure servers and accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

Export outside the UK/EEA

- 4.3 Your personal information may be accessed by staff or suppliers in, transferred to, and/or stored at, a destination outside the UK or European Economic Area (EEA) in which data protection laws may be of a lower standard than in the UK or EEA. Regardless of location or whether the person is an employee or contractor we will impose the same data protection safeguards that we deploy inside the UK or EEA.
- 4.4 Certain countries outside the UK or EEA have been approved by the European Commission as providing essentially equivalent protections to UK and EEA data protection laws and therefore no additional safeguards are required to export personal information to these jurisdictions. In countries which have not had these approvals, (see the full list here http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm). We will either ask for your consent to the transfer or transfer it subject to European Commission approved contractual terms that impose equivalent data protection obligations directly on the recipient unless we are permitted under applicable data protection law to make such transfers without such formalities.

Please contact us as set out in paragraph 5.4 below if you would like to see a copy of the specific safeguards applied to the export of your personal information.

- 4.5 We will retain your personal information for as long as is necessary for the processing purpose(s) for which they were collected and any other permitted linked purpose (for example certain transaction details and correspondence may be retained until the time limit for claims in respect of the transaction has expired or in order to comply with regulatory requirements regarding the retention of such data). So if information is used for two purposes we will retain it until the purpose with the latest period expires; but we will stop using it for the purpose with a shorter period when that period expires.
- 4.6 We restrict access to your personal information to those persons who need to use it for the relevant purpose(s). Our retention periods are based on business needs and your information that is no longer needed is securely destroyed.

5 Your rights & contacting us

- 5.1 If you have any questions in relation to our use of your personal information, you should first contact us as per paragraph 5.3 below. Under certain conditions, you may have the right to require us to:
- (a) provide you with further details on the use we make of your information;
 - (b) provide you with a copy of information that you have provided to us;
 - (c) update any inaccuracies in the personal information we hold (please see paragraph 5.2);
 - (d) delete any personal information that we no longer have a lawful ground to use;

- (e) where processing is based on consent, to withdraw your consent so that we stop that particular processing;
 - (f) object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
 - (g) restrict how we use your information whilst a complaint is being investigated.
- 5.2 Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). If you exercise any of these rights we will check your entitlement and respond in most cases within a month.
- 5.3 If you are not satisfied with our use of your personal information or our response to any exercise of these rights you have the right to complain to the Information Commissioner's Office.
- 5.4 If you have any questions in relation to this policy, please contact our Data Protection Contact by writing to Invensys Pension Trustee Ltd, 80 Victoria Street, London, SW1E 5JL.

6 Changes to our Privacy Policy

- 6.1 Our Privacy Policy may change from time to time in the future. If we change the uses of your information collected offline we will provide an update to this Privacy Policy to you.
- 6.2 This Privacy Policy was last updated on 25 May 2018.
- 6.3 Further notices highlighting particular uses we wish to make of your personal information together with the ability to opt in or out may also be provided to you when we collect certain personal information from you.

Appendix 1

Details of legal bases used to justify the processing of your personal information

These are the principal legal grounds that justify our use of your information as referred to in the section 3 of the Data Protection Notice titled "Uses made of your personal information":

Consent: where you have consented to our use of your information (you will have been presented with a consent form in relation to any such use).
Contract performance: where your information is necessary to enter into or perform our contract with you.
Legal obligation: where we need to use your information to comply with our legal obligations.
Legitimate interests: where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.
Legal claims: where your information is necessary for us to establish, defend, prosecute or make a claim against you, us or a third party.